

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION
Case No.: 9:23-cv-81150-RLR**

ANDREW TATE AND TRISTAN TATE,

Plaintiffs

vs.

JANE DOE ET AL.,

Defendants.

**DECLARATION OF TORI HIRSCH IN SUPPORT OF DEFENDANTS' REPLY TO
PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO FILE ROMANIAN
INDICTMENT UNDER SEAL**

Victoria Hirsch, pursuant to 28 U.S.C. § 1746 hereby declares as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration. The evidence set out in the foregoing Declaration is based on my personal knowledge.
2. I am an attorney with the National Center on Sexual Exploitation, and submit this Declaration in support of Defendants' reply to Plaintiffs' opposition to Defendants' motion to file the Romanian Indictment under seal.
3. On or about August 14, 2023, I submitted a request to the Romanian Court, citing their Freedom of Information law, to obtain a copy of the Plaintiff's indictment.
4. On August 17, 2023, I received an email back stating that my request was registered in the records of the Office of Information and Public Relations, and that my request was being evaluated.

5. On August 21, 2023, I received an email reply from the Romanian Court, notifying me that my request was forwarded to the management of the Criminal Tribunal Section. That assessment stated that the case of interest to me was characterized by a lack of publicity. I did not receive a copy of the Indictment.
6. On or about August 22, 2023, I again requested the Indictment, including Jane Doe's engagement agreement with NCOSE as proof of representation to show the Court that we were not simply members of the public, but her lawyers in civil court in the United States.
7. On August 29, 2023, I received an email reply from the Romanian Court, notifying me that because certain portions of the criminal trial were not public, the documents were also heard in closed session and were only available to the representatives of the parties, lawyers, experts, and interpreters appointed in that case.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 29, 2023.

By: /s/ Victoria Hirsch